# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JEFFREY LAYDON, on behalf of himself and all others similarly situated,

Plaintiff,

- against -

THE BANK OF TOKYO-MITSUBISHI UFJ, LTD., THE SUMITOMO TRUST AND BANKING CO., LTD., THE NORINCHUKIN BANK, MITSUBISHI UFJ TRUST AND BANKING CORPORATION, SUMITOMO MITSUI BANKING CORPORATION, J.P. MORGAN CHASE & CO., J.P. MORGAN CHASE BANK, NATIONAL ASSOCIATION, J.P. MORGAN SECURITIES PLC, MIZUHO CORPORATE BANK, LTD., DEUTSCHE BANK AG, THE SHOKO CHUKIN BANK, LTD., SHINKIN CENTRAL BANK, UBS AG, UBS SECURITIES JAPAN CO. LTD., THE BANK OF YOKOHAMA, LTD., SOCIETE GENERALE SA, THE ROYAL BANK OF SCOTLAND GROUP PLC, THE ROYAL BANK OF SCOTLAND PLC, RBS SECURITIES JAPAN LIMITED, BARCLAYS BANK PLC, CITIBANK, NA, CITIGROUP, INC., CITIBANK, JAPAN LTD., CITIGROUP GLOBAL MARKETS JAPAN, INC., COOPERATIEVE CENTRALE RAIFFEISEN-BOERENLEENBANK B.A., HSBC HOLDINGS PLC, HSBC BANK PLC, LLOYDS BANKING GROUP PLC, ICAP EUROPE LIMITED, R.P. MARTIN HOLDINGS LIMITED, MARTIN BROKERS (UK) LTD., TULLETT PREBON PLC, AND JOHN DOE NOS. 1-50,

Defendants.

Docket No. 12-cv-3419 (GBD)

FUND LIQUIDATION HOLDINGS LLC as assignee and successor-in-interest to Sonterra Capital Master Fund, Ltd., HAYMAN CAPITAL MASTER FUND, L.P., JAPAN MACRO OPPORTUNITIES MASTER FUND, L.P., and CALIFORNIA STATE TEACHERS' RETIREMENT SYSTEM, on behalf of themselves and all others similarly situated,

Docket No. 15-cv-5844 (GBD)

#### Plaintiffs,

#### - against -

UBS AG, UBS SECURITIES JAPAN CO. LTD., SOCIÉTÉ GÉNÉRALE S.A., NATWEST GROUP PLC, NATWEST MARKETS PLC, NATWEST MARKETS SECURITIES JAPAN LTD, NATWEST MARKETS SECURITIES, INC., BARCLAYS BANK PLC, BARCLAYS PLC, COÖPERATIEVE RABOBANK U.A., LLOYDS BANKING GROUP PLC, LLOYDS BANK PLC, NEX INTERNATIONAL LIMITED, ICAP EUROPE LIMITED, TP ICAP PLC, BANK OF AMERICA CORPORATION, BANK OF AMERICA, N.A., MERRILL LYNCH INTERNATIONAL, AND JOHN DOE NOS. 1-50,

Defendants.

NOTICE OF REPRESENTATIVE PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENTS WITH (1) BARCLAYS BANK PLC, BARCLAYS CAPITAL INC., AND BARCLAYS PLC, (2) NEX INTERNATIONAL LIMITED AND ICAP EUROPE LIMITED, AND (3) TP ICAP PLC

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, the

Declaration of Vincent Briganti and the exhibits attached thereto including the Settlement

Agreements, and the record herein, Representative Plaintiffs Jeffrey Laydon, the California State

Teachers' Retirement System, Fund Liquidation Holdings, LLC, individually and as assignee and

successor-in-interest to Sonterra Capital Master Fund, Ltd., Hayman Capital Master Fund, L.P.,

and Japan Macro Opportunities Fund, L.P., by and through their undersigned counsel, will

respectfully move this Court, before the Honorable George B. Daniels, United States District

Judge, at the United States District Court, Southern District of New York, 500 Pearl Street, New

York, New York, on such a date and time as the Court may direct, for an order granting

Representative Plaintiffs' motion for preliminary approval of the settlements with Defendants

Barclays Bank PLC, Barclays Capital Inc., and Barclays PLC, Nex International Limited (f/k/a

ICAP plc) and ICAP Europe Limited, and TP ICAP plc (f/k/a Tullett Prebon plc and n/k/a TP

ICAP Finance plc), and the other relief set forth in the proposed orders filed herewith.

Dated: July 22, 2022

White Plains, New York

Respectfully submitted,

LOWEY DANNENBERG, P.C.

/s/ Vincent Briganti

Vincent Briganti Geoffrey M. Horn

44 South Broadway

White Plains, NY 10601

Tel.: (914) 997-0500

Fax: (914) 997-0035 vbriganti@lowey.com

ghorn@lowey.com

Lead Counsel for the Representative Plaintiffs

Joseph J. Tabacco, Jr. Todd A. Seaver

### **BERMAN TABACCO**

425 California Street, Suite 2300 San Francisco, CA 94104

Tel.: 415-433-3200 Fax: 415-433-6282

Patrick T. Egan

## **BERMAN TABACCO**

One Liberty Square Boston, MA 02109 Tel.: 617-542-8300

Fax: 617-542-1194

Christopher Lovell
Gary S. Jacobson
LOVELL STEWART HALEBIAN
JACOBSON LLP

500 Fifth Avenue, Suite 2440 New York, NY 10110 Tel.: (212) 608-1900

Fax: (646) 398-8392

Additional Plaintiffs' Counsel